Evaluations of Project XL Innovations

ICR Supplementary Statement

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DRAFT

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Office of Policy, Economics, and Innovation
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EVALUATIONS OF PROJECT XL INNOVATIONS

1.0 SHORT CHARACTERIZATION

In March 1995, the U.S. Environmental Protection Agency initiated Project XL in response to the challenge to transform the environmental regulatory system to better meet the needs of a rapidly changing society while maintaining the nation's commitment to protect human health and safeguard the natural environment. Through Project XL, which stands for eXcellence and Leadership, EPA enters into specific project agreements with public or private sector sponsors to test regulatory, policy, and procedural alternatives that will produce data and experiences to help the Agency make improvements in the current system of environmental protection. The goal of Project XL is to implement projects that test ways of producing superior environmental performance with improved economic efficiencies, while increasing public participation through active stakeholder processes. EPA currently has 48 XL projects in implementation and expects to achieve the milestone of 50 signed projects by the end of November 2000.

In May 2001, EPA would like to begin in-depth evaluations of different Project XL innovations in order to determine which, if any, innovations have the potential for wider application. Currently, EPA has identified more than 65 innovations resulting from projects in implementation. These innovations center around regulations, permitting, environmental information management, compliance and enforcement, environmental stewardship, and stakeholder involvement. From the identified innovations, EPA plans to evaluate a select set the Agency believes has potential for broader application. As more XL projects move into implementation and more innovations emerge, EPA plans to continue this same process of selecting a set of new innovations and then evaluating them.

As a start, EPA intends to begin evaluating permit innovations from projects that have been in implementation for at least a year. In order to determine which, if any, permit innovations can be applied on a wider scale, the Agency hopes to learn about the environmental and economic incentives the permit innovations have provided; if other facilities/companies are interested in applying for the same type of innovations; if the innovations need to be tested again before they can be widely adopted; and if the innovations address the public's concerns and stakeholder information needs.

Based upon advice received in consultation with OMB, it was determined that the best way to proceed with this evaluation initiative would be to develop one overarching XL Information Collection Request (ICR) that discusses EPA's framework for evaluating Project XL innovations in general, and in addition outlines EPA's upcoming plan for evaluations of XL

permitting innovations. This ICR supplementary statement is intended to provide the necessary justification for these efforts. If the original ICR is approved, EPA will develop additional sets of questions centered around other agency core functions and submit these questions to OMB as a package in the form of an amendment to this ICR.

Included with this ICR supplementary statement is the list of questions that EPA will choose from to formulate survey instruments that will be used to gather information on particular XL permitting innovations.

2.0 NEED FOR AND USE OF THE COLLECTION

2.1. NEED / AUTHORITY FOR THE COLLECTION

The evaluations are needed to further the goals of the regulatory reinvention pilot project initiative. Specifically, the evaluations are needed to learn about the positive and negative outcomes of particular innovations both in terms of superior environmental performance, increased economic efficiency, and administrative burden reduction. By definition, the innovations used in different XL projects are experimental in nature. Without in-depth analysis of these innovations, EPA will be unable to learn which innovations have broader applicability.

In particular, in regards to permitting innovations, the Agency hopes to learn about the various incentives a particular permit innovation may have provided; if other facilities/companies are interested in applying for a similar type of innovation; if the innovation needs to be tested again before it can be widely adopted, and if the innovation addresses the public's concerns and stakeholder information needs.

2. 2 USE AND USERS OF THE DATA

The data resulting from the evaluations will be incorporated into various reports. The findings will then be used to discern which innovations should be integrated into Agency core functions, which need further testing and refining before wide-scale adoption, and which should eventually be retired. Second, the findings will be used to provide information to state, tribal, and local agencies attempting their own unique efforts to transform their regulatory systems. Third, the findings will inform industry representatives and the public, allowing them to better play an active, creative role in finding solutions to environmental problems. Finally, the findings will be used by EPA and Congress to help set the course for future EPA XL initiatives.

3.0 NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3.1 Non-duplication

The information to be obtained under this ICR has not been collected by EPA or any other state, tribal, or local agency.

3.2 Public Notice Required Prior to ICR Submission to OMB

In compliance with the Paperwork Reduction Act (44 U.S.C. 3501 et seq.), EPA is currently soliciting comments on specific aspects of this ICR. ***A Federal Register (F.R.) notice for "Evaluations of Project XL Innovations" was published in the Federal Register on November 10, 2000, (Vol __, No. __, pages_____)***.

3.3 Consultations

This notice was developed by a team consisting of EPA headquarters and regional personnel.

3.4 Effects of Less Frequent Collection

The information collection could not be conducted less frequently. The evaluations are necessary to determine which innovations should be transferred into the EPA's national system of environmental protection. Although there are several innovations already identified, with several more emerging as more projects move into implementation, EPA in no way intends to perform evaluations for every innovation that is identified. Only those innovations that EPA management already feels have considerable potential for wide-scale adoption will be evaluated.

3.5 General Guidelines

All of the collection activities described within this ICR fall within OMB's General Guidelines.

3.6 Confidentiality

None of the information that will be collected is confidential in nature.

3.7 Sensitive Questions

No information of a sensitive nature will be required to be submitted by the respondents.

4.0 THE RESPONDENTS AND THE INFORMATION REQUESTED

4.1 Respondents and SIC Codes

Potential respondents include all entities regulated by EPA who are involved with a particular innovation and would like to participate in an evaluation or non-regulated persons or organizations that have an interest or concern in regards to a particular innovation and would like to participate in an evaluation.

4.2 INFORMATION REQUESTED

To conduct an evaluation, EPA will select a particular innovation and then identify a list of people EPA could interview to learn more about that particular innovation. EPA will then choose from a set of questions pre-approved by OMB centered around a particular agency core function, such as permitting. With these questions EPA will develop specific interview questionnaires for the different categories of persons to be interviewed. For instance, one interview questionnaire will be developed solely for project sponsors or persons in similar positions at different companies/facilities that would reasonably be interested in the innovation. Others will be developed for state, tribal, and local agency officials, academia, community stakeholders, etc. EPA plans to conduct interviews via phone with use of a third-party contractor.

Through the interviews, EPA hopes to collect following types of data:

- Description of innovation (extent to which innovation originally envisioned at start of project matches innovation in implementation)
- Predictability of innovation
- Extent to which innovation has reduced/increased administrative burden
- Extent to which innovation has resulted in environmental benefits
- Extent to which innovation has resulted in efficiencies
- Extent to which public has increased access to data a result of innovation

- Extent to which public accepts innovation
- Extent to which innovation allows for accountability
- Extent to which innovation allows for proper compliance and/or enforcement
- Extent to which innovation accounts for environmental justice concerns
- Extent to which innovation is transferable to other companies/sectors

Specifically, interview questions regarding a particular permit innovation may include the following:

- What incentives has the permit innovation provided? (e.g., reporting flexibility, reduced monitoring)
- Has the permit innovation reduced administrative burden?
- What were the expectations for environmental benefits and have they been met?
- Have the public's concerns regarding the permit innovation been adequately addressed?
- Would other companies be interested in this types of innovation?

The information collected will be mainly anecdotal though quantitative information will be collected if available. Due to the site-specific characteristics of each innovation, it will be difficult to perform any statistical comparisons of innovations centered around the same core function that would yield useful information.

5.0 THE INFORMATION COLLECTED: GOVERNMENT ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

5.1 GOVERNMENT ACTIVITIES

Agency activities associated with the collection of information include:

- Develop interview questionnaire;
- Assemble data sources (mailings lists, etc.);
- Pretest interview questionnaire;
- Internal OEPI review and approval of questionnaires;
- Make initial phone calls to potential interviewees to determine whether they would like to participate in phone interviews;
- Make phone calls to determine times of interviews;
- Disseminate questionnaires to respondents;
- Perform telephone interviews;
- Gather information from respondents;
- Review data;

- Analyze results;
- Prepare findings;
- Distribute results internally and make results publicly available when appropriate.

5.2 COLLECTION METHODOLOGY AND MANAGEMENT

EPA may not interview more than nine non-federal persons regarding a particular permit innovation unless it receives clearance from OMB. The supplementary statement for this ICR seeks OMB and public approval for EPA's general framework for performing evaluations of innovations and, in particular, approval for performing evaluations of XL permit innovations. The list of questions for permit innovations are included as an attachment. If these are approved, EPA will develop different interview questionnaires based upon the questions listed in order to conduct evaluations of permit innovations. For example, from the questions listed, EPA plans to develop a single interview questionnaire for project sponsors and persons representing similar businesses/municipalities who would have reasonable interest in a specific permit innovation. From the same set of questions, EPA would also develop another interview questionnaire that would be used to interview community stakeholders, representatives from environmental groups, and academics who have a reasonable interest in the permit innovation. Once EPA completes an evaluation for a single permit innovation, EPA may choose to use the same two questionnaires when evaluating another permit innovation. However, in order to learn as much as possible about the permit innovation, EPA may need to modify the interview questionnaires slightly depending upon the potential respondent. Nevertheless, EPA will continue to draw upon the same base of permit questions included in the attachment.

When EPA plans to conduct an evaluation of an XL innovation centered around a different agency core function, such as environmental stewardship (e.g., pollution prevention), EPA will develop another set of questions which will then be submitted to OMB along with an ICR. The ICR will be submitted as an amendment to the ICR that is the subject of this ICR supplementary statement. Once the ICR amendment is approved, EPA will then begin to develop questionnaires for respondents in the same manner discussed above. This process will be repeated whenever EPA makes the decision to begin evaluating XL innovations centered around other agency core functions.

EPA is enlisting an external program evaluation expert to assist in establishing interview times for those agreeing to participate in interviews, conducting the interviews, analyzing results, and compiling them.

5.3 SMALL ENTITY FLEXIBILITY

The interview questions have been develop in such a way that they would be relatively easy to respond to, with no undue burden being imposed on entities without full-time environmental managers, etc. EPA does not expect that this solicitation would impose additional burdens on small entities.

5.4 COLLECTION SCHEDULE

The first collection of information will begin in May 2001. Other evaluations will soon follow periodically throughout the three years for which this ICR is approved. Once EPA makes the determination to begin evaluating a particular innovation, the process of selecting possible persons for interviews, developing interview questionnaires, conducting interviews, performing analyses, and compiling results should require less than six months to complete.

6.0 ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6.1 Estimating Respondent Burden and Cost

This section describes EPA's estimates of the burden hours and cost to complete the information collection activities associated with this collection. Two sets of respondent estimates are included below. The first set of estimates detail the burden and cost for respondents participating in evaluations of Project XL innovations that EPA expects to conduct over the next three years (Total Respondents). The second set of estimates takes into account the burden and cost for respondents only taking part in permit evaluations over the next three years (Permit Respondents). Additionally, two sets of Agency estimates are included below.

It is assumed that managers, technical staff, academics, lawyers, and other persons representing a wide array of professional backgrounds will participate in the interviews. Since the potential respondents represent such a diverse group, the labor costs are estimated at $64.00 per hour. To derive these estimates EPA referred to data from the Bureau of Labor Statistics and current EPA publications. There is no need for "developing, acquiring or utilizing technology and systems for the purpose of collecting, validating or verifying information", "...disclosing and providing information", "adjusting the existing ways to comply with any previously applicable instructions or requirements", "training personnel to be able to respond to a collection of information", "searching data sources" , nor a need for the respondents to keep records. Burden activities include only a few steps: (1) reviewing instructions and questions in advance, and (2) participating in the interview.

No capital expenditures are needed by the respondent to complete the interview since the

responses can be made using existing equipment (e.g., telephone).

No operating and maintenance costs are needed to complete the interview, since the interview activities (reviewing instructions and questions in advance, and participating in the interview) are one-time only activities and can be conducted using existing equipment (e.g., telephone).

Total Respondents

It is estimated that there will be 200 respondents participating annually in the Project XL innovation interviews. EPA estimates that each respondent will spend approximately two hours reviewing the questions before participating in the phone interview, and each respondent will spend one hour on the phone participating during the interview. To fulfill all information collection requirements for respondents, EPA estimates that it will cost each respondent approximately $192 and take approximately three hours. Divided by three years, since ICRs are approved for three year periods, this comes out to approximately $64 and one hour per respondent per year . The cost and burden estimates for each separate information requirement are listed below in Table 1.

Table 1. Total Respondents - Annual Estimated Respondent Burden and Cost

Collection Activity	Hours/ Evaluation/ Respondent	Average Respondent Costs/Hour	Respondent Costs/ Evaluation (A)	Number of Evaluations/Year	Number of Respondents/ Evaluation/Year	Total Number of Respondents/ Year (B)	Total Respondent Hours/Year	Total Costs/ Year = A * B
Review of Interview Questionnaire	0.7	64	$ 45	10	20	200	140	$ 9,000
Interview	0.3	64	$ 19	10	20	200	60	$ 3,800
Total	1.0	N/A	$ 64	N/A	N/A	N/A	200	$ 12,800

*EPA estimates each respondent would require two hours to review the interview questionnaire before the actual interview. Additionally, EPA estimated that it will require one hour to perform the interview. Since the ICR covers a three year period as opposed to one, the numbers in this column have been divided by three.

Permit Respondents

It is estimated that there will be 60 respondents participating annually in the Project XL permit innovation interviews. EPA estimates that each respondent will spend approximately two hours reviewing the questions before participating in the phone interview, and each respondent

will spend one hour on the phone participating in the interview. To fulfill all information collection requirements for respondents, EPA estimates that it will cost each respondent approximately $153 and take approximately three hours. Divided by three years, since ICRs are approved for three year periods, this comes out to approximately $51 and one hour per respondent per year. The cost and burden estimates for each separate information requirement are listed below in Table 2.

Table 2. Permit Respondents - Annual Estimated Respondent Burden and Costs

Collection Activity	Hours/ Evaluation/ Respondent	Average Respondent Costs/Hour	Respondent Costs/Evaluation (A)	Number of Evaluations/ Year	Number of Respondents/ Evaluation/Year	Total Number of Respondents/ Year (B)	Total Respondent Hours/Year	Total Costs/ Year =A * B
Review of Interview Questionnaire	0.7	$ 64	$ 45	3	20	60	42	$ 2,700
Interview	0.3	$ 64	$ 19	3	20	60	18	$ 1,140
Total	1.0	N/A	$ 64	N/A	N/A	N/A	60	$ 3,840

*EPA estimated each respondent would require two hours to review the interview questionnaire before the actual interview. Additionally, EPA estimated that it will require one hour to perform the interview. Since the ICR covers a three year period as opposed to one, the numbers in this column have been divided by three.

6.2 Estimating Agency Cost and Burden

This section represents EPA's estimates of the agency burden hours and cost required to complete the information collection activities associated with this collection. Two sets of respondent estimates are included below. The first set of agency estimates detail the cost and burden for agency activities required to perform evaluations for innovations that EPA chooses to evaluate over the next three years (Agency XL Innovation Evaluations). The second set of estimates detail the cost and burden for agency activities required to perform evaluations solely for permit innovations (Agency Permit Innovation Evaluations).

The rate used to estimate EPA hourly wage was based upon 2000 GS-13/01 salary of $60,890 (or $29.27) with overhead of 110% factored in, resulting in $62/hour.

Agency XL Innovation Evaluations

EPA will use a third party contractor to assist in establishing interview times for those agreeing to participate in interviews, conducting interviews, analyzing results, and compiling

them. On its own, EPA will establish a mailing list of potential persons to be interviewed, make initial contacts to determine persons willing to be interviewed, develop interview questionnaires for the different categories of persons to be interviewed for each innovation to be analyzed, pre-test the interview questionnaires, and conduct an internal EPA review and approval process for the questionnaires.

EPA estimates that it will require 800 Agency hours per year and cost the Agency $299,600 per year to perform all necessary evaluations, or 80 hours per evaluation per year and $29,960 per evaluation per year.

Table 3. Agency Burden and Cost for Project XL Innovation Evaluations

Collection Activity	Hours/ Agency Evaluation	Number of Evaluations/ Year	Total Agency Hours/Year (A)	Average Agency Cost/Hour (B)	Agency Costs/ Evaluation	Total Costs/Year = A*B
Agency-Only Activity						
Develop questionnaire	16	10	160	$ 62	$ 992	$ 9,920
Pretesting interview questionnaire	24	10	240	$ 62	$ 1,488	$ 14,880
Internal Agency review & approval	16	10	160	$ 62	$ 992	$ 9,920
Develop mailing list	16	10	160	$ 62	$ 992	$ 9,920
Make initial contacts with potential interviewees	8	10	80	$ 62	$ 496	$ 4,960
Subtotal	80	N/A	800	N/A	$ 4,960	$ 49,600
External Contractor					$ 25,000	$ 250,000
Total					$ 29,960	**$ 299,600**

Agency Permit Innovation Evaluations

EPA will use a third party contractor to assist in establishing interview times for those agreeing to participate in the permit innovation evaluation interviews, conducting interviews, analyzing results, and compiling them. On its own, EPA will establish a mailing list of potential persons to be interviewed, make initial contacts to determine persons willing to be interviewed, develop interview questionnaires for the different categories of persons to be interviewed for each innovation to be analyzed, pre-test the interview questionnaires, and conduct an internal EPA review and approval process for the questionnaires.

EPA estimates that it will require 240 Agency hours per year and cost the Agency $89,880

per year to perform all necessary evaluations, or 80 hours per evaluation per year and $29,960 per evaluation per year.

Table 4. Agency Burden and Cost for Permit Innovation Evaluation

Collection Activity	Hours/ Agency Evaluation	Number of Evaluations/ Year	Total Agency Hours/Year (A)	Average Agency Cost/Hour (B)	Agency Costs/ Evaluation	Total Costs/ Year = A*B
Agency-Only Activity						
Develop questionnaire	16	3	48	$ 62	$ 992	$ 2,976
Pretesting interview questionnaire	24	3	72	$ 62	$ 1,488	$ 4,464
Internal Agency review & approval	16	3	48	$ 62	$ 992	$ 2,976
Develop mailing list	16	3	48	$ 62	$ 992	$ 2,976
Make initial contacts with potential interviewees	8	3	24	$ 62	$ 496	$ 1,488
Subtotal	80	3	240	N/A	$ 4,960	$ 14,880
External Contractor					$ 25,000	$ 75,000
Total					$ 29,960	**$ 89,880**

6.3 Estimating the Respondent Universe and Total Burden Costs

Total Respondents

EPA estimates that 200 respondents will take part in the innovation evaluations each year.

Permit Respondents

EPA estimates that 60 respondents will take part in the permit innovation evaluations each year.

6.4 Bottom Line Burden Hours and Cost Tables

Total Respondents

Table 5 presents the annual burden hour and cost estimates for all respondents that will take

part in the innovation evaluations.

Table 5. Bottom Line Burden and Costs/Year for Respondents Participating in XL Innovation Evaluations

Number of Respondents/Year	Burden Hours/Year	Costs/Year
200	200	$ 12,800

Permit Respondents

Table 6 presents the annual burden hour and cost estimates for all respondents that will take part in the XL permit innovation evaluations.

Table 6. Bottom Line Burden and Costs for Respondents Participating in XL Permit Innovation Evaluations

Number of Respondents/Year	Burden Hours/Year	Costs/Year
60	60	$ 3,840

Agency XL Innovation Evaluations

Table 7 presents the annual burden hour and cost estimates for agency activities necessary to conduct evaluations of all XL innovation evaluations.

Table 7. Bottom Line Burden and Costs for Agency XL Innovation Evaluations

Burden Hours/Year	Costs/Year
800	$ 299,600

Agency Permit Innovation Evaluations

Table 8 presents the annual burden hour and cost estimates for agency activities necessary to conduct evaluations of all XL permit innovation evaluations.

Table 8. Bottom Line Burden and Costs for Agency Permit Innovation Evaluations

Burden Hours/Year	Costs/Year
240	$ 89,880

6.5 Reasons for Change in Burden

This new burden results from the desire of EPA to learn from the XL innovations in general and permit innovations in particular that are emerging from the numerous XL projects now in implementation. Only by conducting in-depth evaluations of each of these evaluations will EPA be able to make an appropriate judgement as to whether certain innovations have merit to be adopted on a wider-scale.

6.6 Burden Statement

The estimated burden for respondents participating in the XL innovation evaluations is one hour per year per respondent. The estimated burden for respondents performing in XL permit innovation evaluations is one hour per year.

Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Avenue, NW, Washington, D.C. 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget,

725 17th Street, NW, Washington, DC 20503, ***Attention: Desk Officer for EPA. Include the EPA ICR number (1993.01) and OMB control number in any correspondence***.

Attachment

List of Questions to be Used in Developing Permit Innovation Interview Questionnaires

The types of permit innovation evaluation questions EPA would like to ask are listed below.

I. Description of Permit Innovation Mechanism/Tool

- What is the key permit innovation of your project?
- Why did your facility/company seek out this type of permit innovation?
- Now that the innovation is in implementation, does it still fit the company's original vision?
- Has anything changed based on the permit innovation in implementation?

- What is the permit innovation mechanism/tool, specifically?
- What is the innovation mechanism/tool designed to do?
- Has the innovation mechanism/tool been used? Why or why not?
- Has the innovation mechanism/tool helped you meet the desired outcomes of your project? Why or why not?
- What unforseen barriers have you encountered trying to use this innovation mechanism/tool?
- How long do you expect to use the innovation mechanism/tool?
- What incentives has the innovation mechanism/tool provided? (e.g., reporting flexibility, reduced monitoring, self-certification, reduced compliance testing, preapproval-New Source Review flexibility, administrative cost savings)

II. Outcomes

Time

- Has the permit innovation mechanism/tool reduced administrative burden? Please explain.
- Given the permit innovation you've described, are you finding that it's more or less burdensome to determine compliance with this innovation mechanism/tool? Why or why not?

Predictability

- Does the permit innovation mechanism/tool provide for better planning capabilities? Please explain.
- Does the innovation mechanism/tool lower the risk associated with operational changes? Please explain.

Efficiencies

- Has the permit innovation mechanism/tool resulted in significant efficiencies? Please explain.
- Has the innovation mechanism/tool resulted in significant operational benefits not already described? Please explain.
- Are there more efficient alternatives to the innovation mechanism/tool you have described? Please explain.

Environmental Benefits

- Was the permit innovation mechanism/tool adequately designed to enable environmental benefits? Please explain.
- What were the expectations for environmental benefits, and have they been met?
- What environmental benefits, specifically, did the innovation mechanism/tool provide?
- Specifically, how did the innovation mechanism/tool yield environmental benefits?
- How long did it take for the innovation mechanism/tool to begin yielding environmental benefits?
- How are you quantifying those benefits? Please be specific.
- If you are not quantifying benefits, how are you measuring those benefits?
- Has the innovation/mechanism tool resulted in other benefits or improvements to the local environment not already described? Please explain.
- Has the innovation/mechanism tool resulted in any unexpected environmental costs? Please explain.

Public Understanding/Access/Acceptance

- Have the public's concerns regarding the permit innovation mechanism/tool been adequately addressed? Please explain.
- Has the innovation mechanism/tool addressed public participation concerns? (e.g.,earlier notice and involvement) Please explain.
- Has the innovation mechanism/tool addressed environmental justice concerns? Please explain.
- Has the innovation mechanism/tool provided for stakeholder information needs? (e.g., level/timing of information or activities, access to reports, etc.) Please explain.
- What efficiencies do you attribute to the innovation mechanism/tool, as a result of public participation? (e.g., time, public support, better innovation ideas, etc.)
- Has the innovation mechanism/tool resulted in other benefits to the local community and general public not already described? Please explain.
- Has the innovation mechanism/tool resulted in concerns to the local community and general public not already described? Please explain.

III. Enforceability/Accountability

- Is the permit innovation mechanism/tool adequate to support the environmental performance baseline and meaningful public involvement?
- Does the innovation mechanism/tool ensure equal or greater compliance than standard permitting?

IV. Transferability

- What changes should be made to enhance efficiency/effectiveness of the permit innovation mechanism/tool?
- What are some complexities of the innovation mechanism/tool that still need to be addressed?
- What are the difficulties of applying this innovation mechanism/tool in the current system?

- Would other companies/facilities be interested in using this type of permit innovation mechanism/tool? Why or why not?
- What are the characteristics and needs of a company/facility that would want this type of innovation mechanism/tool? (e.g., frequent product line movements, short technology turnover

cycles, continuous improvement philosophy, etc.)
- Do you know of other industries/companies who would benefit/be eligible for the same innovation mechanism/tool?
- What barriers would prevent this?
- Should this innovation mechanism/tool be adopted throughout your sector? By other sectors?

- If the permit innovation mechanism/tool was at a different facility than yours…
  -Would you be interested in the innovation mechanism/tool? Why or why not?
  -What would you like to see different? (to make you want something similar)
  -Is there some facet of the innovation mechanism/tool you'd be interested in pursuing at your site?

- Does the permit innovation mechanism/tool need to be re-tested before it can be widely adopted by permit writers?
- If so, how, and at what scale, should the re-testing be done? (e.g., similar facility, sector, trade association)

V. Other
- Have there been any institutional behavior/culture changes resulting from the permit innovation mechanism/tool?

- What are some other intangible benefits that can be attributed to the permit innovation mechanism/tool? (e.g., facility had flexibility to make more publicly beneficial products)
- What are some intangible costs? (e.g., environmental managers' morale declined because of difficulty in implementing innovation mechanism/tool)

- What would be different without this permit innovation mechanism/tool?

- Are you/your facility/company involved in another environmental permit innovation program with EPA/State/local?
  - Describe program
  - Describe innovation
  - Compare/contrast program with this XL project

- Is there any other information you can provide to help us evaluate this permit innovation mechanism/tool?